

EXHIBIT 34

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOROTHY FORTH, TROY TERMINE,)
CYNTHIA RUSSO, INTERNATIONAL)
BROTHERHOOD OF ELECTRICAL)
WORKERS LOCAL 38 HEALTH AND)
WELFARE FUND, LISA BULLARD and)
RICARDO GONZALES, On Behalf of)
Themselves and All Others)
Similarly Situated,)

Plaintiffs,)

vs.)

WALGREEN CO.,)

Defendant.)

Case No.

1:17-cv-02246

The deposition of ERICA REAVES, taken
before Maria S. Winn, CSR, RPR and CRR, pursuant
to the Federal Rules of Civil Procedure for the
United States District Courts pertaining to the
taking of depositions, at Carlson Lynch, 111 West
Washington Street, Suite 1240, Chicago, Illinois,
commencing at 10:29 a.m. on August 21, 2019.

1 BY MR. ALPERSTEIN:

2 Q Yeah. I'm just asking: Do you
3 understand whether or not Walgreens submits its
4 PSC prices, the prices under the Prescription
5 Savings Club, as its U&C prices?

6 MS. COLEMAN: Same objection.

7 A I'm not really sure about the question.

8 BY MR. ALPERSTEIN:

9 Q Does Walgreens submit its PSC prices as
10 U&C prices?

11 A No.

12 Q Why not?

13 A Because they're not the same.

14 Q And why aren't they the same?

15 A Why are the prices not the same?

16 Q Why is the PSC -- well, I asked why
17 Walgreens didn't submit PSC prices as U&C prices,
18 and you said because they're not the same.

19 So can you explain what that means,
20 they're not the same?

21 A Sure. So PSC is a program that a member
22 has to enroll in, or that a customer has to enroll
23 in, and agree to the terms and conditions and pay
24 a fee to belong to.

1 And U&C is the retail price that is
2 available to people -- the list of people, the
3 cash people, that are excluded from all those
4 groups that I mentioned previously.

5 Q Okay.

6 A So that would be why.

7 Q So I think I understood it.

8 PSC is not U&C because of enrollment and
9 paying a fee; that's correct, or is there
10 something else?

11 A Yeah, that's why.

12 Q Because there are other discounts that
13 would be considered as U&C, correct?

14 MS. COLEMAN: Objection to form.

15 BY MR. ALPERSTEIN:

16 Q In other words, I'm asking you: It's not
17 like a general exclusion that all discounts -- no
18 discounts are ever considered in the U&C, right?

19 MS. COLEMAN: Objection to form.

20 A I don't know.

21 BY MR. ALPERSTEIN:

22 Q But it's your understanding that the PSC
23 is not included because of two things: enrollment
24 and payment of a fee?

1 A It's a membership as well.

2 Q Okay. What does "membership" mean?

3 A So when a customer enrolls, they agree to
4 certain terms and conditions.

5 Q Does membership -- is that the same thing
6 as enrolling? If you're enrolling in something,
7 then it's membership?

8 A Sure.

9 Q Okay. So then is it fair to say that
10 it's the membership/enrollment process and the fee
11 that provides your understanding for why PSC
12 should not be U&C?

13 A So I didn't create the program --

14 Q I understand.

15 A -- I can't say that that's 100 percent
16 why it's not U&C. But yeah, those are --

17 Q But your understanding.

18 A Those would be -- yeah. Um-hm.

19 Q What about if there was no fee for the
20 PSC, it was just something you enrolled in.

21 Would that be --

22 A I can't speak to that. I don't know.

23 Q Do you know what Walgreens' policy is, to
24 the extent there's an actual policy, of why the

1 The undersigned is not interested in the
2 within case, nor of kin or counsel to any of the
3 parties.

4 In witness whereof, I have hereunto set
5 my hand and seal of office this day, September 4,
6 2019.

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9 *Maria S. Wain*
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11 CSR No. 084-003784 - Expiration Date: May 31, 2021
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